

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x  
DIEGO ALCANTARA,

Plaintiff,

-against-

OFFICE OF THE SPECIAL NARCOTICS  
PROSECUTOR FOR THE CITY OF NEW YORK  
UC 133, Individually and as an undercover officer  
for the Office of the Special Narcotics Prosecutor for  
the City of New York, UNITED STATES  
DEPARTMENT OF JUSTICE DRUG  
ENFORCEMENT ADMINISTRATION SPECIAL  
AGENT MARK CRANE, UNITED STATES  
DEPARTMENT OF JUSTICE DRUG  
ENFORCEMENT ADMINISTRATION SPECIAL  
AGENT JOHN OLDANO, UNITED STATES  
DEPARTMENT OF JUSTICE DRUG  
ENFORCEMENT ADMINISTRATION SPECIAL  
AGENT MICHAEL DELLAMARA, and UNITED  
STATES DEPARTMENT OF JUSTICE DRUG  
ENFORCEMENT ADMINISTRATION Group  
Supervisor NICHOLAS CARUSO, all individual  
USDOJ DEA Defendants are being sued in their  
individual capacities,

Defendants.

-----x  
**DECLARATION OF  
OFFICE OF THE  
SPECIAL NARCOTICS  
PROSECUTOR FOR  
THE CITY OF NEW  
YORK UC # 133**

07 CV 6480 (JGK)

**UC # 133**, declares pursuant to 28 U.S.C. § 1746, under penalty of perjury, that  
the following is true and correct.

1. I am an undercover law enforcement officer in the Office of the Special  
Narcotics Prosecutor for the City of New York, where I have been employed for 14 years. I have  
been a law enforcement officer for 34 years, and have worked in the area of narcotics and money

laundering investigations for approximately 20 years. I have worked with various local and federal law enforcement agencies over the years.

2. In October of 2001, I assisted in a matter that was part of a federal investigation known as "Operation White Dollar." That investigation was conducted by members of the United States Department of Justice Drug Enforcement Administration ("DEA"). Operation White Dollar was comprised of a series of approximately 30 investigations that the Attorney General authorized in September 2001, to permit the DEA to launder drug proceeds as part of a law enforcement effort. As part of this operation, money was to be delivered to undercover officers, deposited in undercover bank accounts controlled by the DEA, and wired to other bank accounts as part of a federal undercover money laundering operation in order to locate, arrest, and prosecute participants in large narcotics money laundering conspiracies.

3. I was an undercover officer who participated in many investigations that were part of Operation White Dollar. My role in those investigations was strictly limited to transactions in which I arranged one or more meetings with a member or members of a drug money laundering conspiracy, attended the meeting or meetings, took the money, and then immediately transferred the money to one or more DEA surveillance agents. During the meetings, DEA surveillance agents followed me and monitored my activities throughout the transaction. I was not responsible for identifying any suspects or providing identifying information to be used in connection with their arrests and/or prosecutions. I did not participate in any arrests or participate in the decision to arrest or prosecute anyone related to Operation White Dollar, seek an indictment, testify before a grand jury, or provide any information to be presented to a grand jury.

4. As an undercover law enforcement officer, my activities were closely monitored and tracked by a surveillance team comprised of a number of DEA agents. My role was limited because, as an undercover officer, my personal safety and the safety of others would be compromised if my identity were to become known. As a result, the identification of drug money laundering couriers with whom I have come face-to-face has been the responsibility of DEA team members and not my responsibility. I do not know plaintiff Diego Alcantara, nor was I aware of his arrest or prosecution until this lawsuit was filed in 2007.

5. I acted reasonably and believed in good faith that my actions were lawful during my role in the investigation described above.

Dated: New York, New York  
August 25, 2008

UC 133  
Office of the Special Narcotics Prosecutor  
for the City of New York UC # 133

Index No. 07 CV 6480 (JGK)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DIEGO ALCANTARA,

Plaintiff,

-against-

OFFICE OF THE SPECIAL NARCOTICS PROSECUTOR FOR  
THE CITY OF NEW YORK UC 133, Individually and as an  
undercover officer for the Office of the Special Narcotics Prosecutor  
for the City of New York, UNITED STATES DEPARTMENT OF  
JUSTICE DRUG ENFORCEMENT ADMINISTRATION SPECIAL  
AGENT MARK CRANE, UNITED STATES DEPARTMENT OF  
JUSTICE DRUG ENFORCEMENT ADMINISTRATION SPECIAL  
AGENT JOHN OLDANO, UNITED STATES DEPARTMENT OF  
JUSTICE DRUG ENFORCEMENT ADMINISTRATION SPECIAL  
AGENT MICHAEL DELAMARA, and UNITED STATES  
DEPARTMENT OF JUSTICE DRUG ENFORCEMENT  
ADMINISTRATION Group Supervisor NICHOLAS CARUSO, all  
individual USDOJ DEA Defendants are being sued in their  
individual capacities,

Defendants.

**DECLARATION OF OFFICE OF THE SPECIAL  
NARCOTICS PROSECUTOR FOR THE CITY OF NEW  
YORK UC # 133**

***MICHAEL A. CARDOZO***  
*Corporation Counsel of the City of New York*  
Attorney for Defendant Office of the Special  
Narcotics Prosecutor for the City of New York  
UC # 133  
New York, N.Y. 10007

*Of Counsel: Susan P. Scharfstein (SS 2476)*  
*Tel: (212) 227-4071*  
*NYCLIS No.:*

*Due and timely service is hereby admitted.*

*New York, N.Y. ...., 200...*

*....., Esq.*

*Attorney for.....*